

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

# **JOINT INTERIM STATUS REPORT**

Pursuant to Local Rule 116.5(b), the parties hereby file the following joint interim status report prepared in connection with the interim status conference scheduled for March 22, 2022.

### 1) Automatic Discovery

The government provided automatic discovery to the defendants on October 29, 2021 and has made supplemental discovery productions on December 10, 2021, January 10, 2022, and February 17, 2022.

## 2) Additional Discovery

The government anticipates providing supplemental discovery to the defendants, including specifically data from a laptop and four cell phones belonging to two non-parties. The government is preparing a proposal for an orderly manner of making data from these sources available to defendants given the volume of digital data at issue, and the parties will work toward a mutually agreeable arrangement. The government will provide additional discovery to the defendants if it receives or identifies additional documents.

### 3) Timing of Additional Discovery Requests

The defendants have not submitted any discovery requests to the government to date. The defendants are continuing to review discovery and, at this time, reserve the need for further discovery requests.

#### 4) Protective Orders

The Court has entered a protective order in this matter. *See* Dkt. No. 37.

5) Pretrial Motions

The defendants have not filed any pretrial motions under Fed. R. Crim. P. 12(b). They reserve the right to file such a motion or motions after additional review of the discovery.

6) Expert Discovery

The parties agree that deadlines for expert disclosures should be established at a later conference.

7) Defenses of Insanity, Public Authority, or Alibi

None of the defendants presently intends to assert a defense of insanity, public authority, or alibi.

8) Speedy Trial Act

All time has been excluded under the Speedy Trial Act from the date of the defendants' arraignments through March 22, 2022.

The parties request that the time be excluded from March 22, 2022 until the next status conference in this matter.

9) Status of Plea Discussions and Likelihood of Trial

The parties have not discussed a plea disposition. The parties estimate that a trial in this matter would last three to five weeks.

10) Next Status Conference

Given the foregoing information, the parties request that the interim status conference, scheduled for March 22, 2022, be canceled. The parties request that an interim status conference be scheduled in approximately 60 days.

Respectfully submitted,

KINGSLEY R. CHIN

By his attorney,

*/s/ William D. Weinreb*

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Dated: March 15, 2022

**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

*/s/ David J. Derusha*  
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Assistant United States Attorney

Dated: March 15, 2022